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June 12, 2019

Via ECF

Hon. Paul A. Engelmayer United States District Court Southern District of New York 40 Foley Square New York, New York 10007

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Re.: Johnson v. Construction and Realty Services Group, Inc. et al., Case No. 18-cv-9347 (PAE)

Dear Judge Engelmayer:

As the Court is aware, this firm represents defendants Construction Realty Services Group, Inc., Trade Off LLC, and Ronald Lattanzio ("Defendants") in the above-referenced action brought by plaintiff Javashia Johnson ("Plaintiff"). On consent of Plaintiff's counsel (Jason Solotaroff, Esq.), we seek an adjournment of the mediation currently scheduled for Monday, June 17, 2019.

We make this application because the parties have been engaged in settlement negotiations and, provided that Defendants are able to finance settlement on the tentative terms we have discussed with Plaintiff's counsel, settlement may be imminent. This settlement would be part of a global resolution of several separate actions brought against Defendants by individuals represented by Mr. Solotaroff, all alleging sexual harassment. While Defendants had hoped to be able to reach a settlement prior to the mediation date, we need a bit more time to determine whether the proposed terms of settlement are workable in terms of payment. Accordingly, Defendants would prefer not to allocate resources to a mediation when those resources (i.e., funds spent on legal fees for a full day of mediation, plus preparation for same) could be applied to settlement, particularly on a date when Defendants will not be in a position to authorize settlement on the terms desired by Plaintiff.

Based on these circumstances, we respectfully request that the mediation be adjourned to give the parties more time to reach a settlement in the most expedient and cost-efficient manner possible. We would suggest that the mediation be rescheduled in the event that the parties are unable to reach a settlement by themselves.

Your Honor's consideration of this application is appreciated.

Respectfully submitted,

Lisa Skuck

Lisa Skruck

cc: Jason Solotaroff, Esq. (via ECF)

4828-8332-0985, v. 1

Granted. The Court hereby grants a two-week adjournment of the mediation currently scheduled for June 17, 2019. Should the parties not be able to reach a settlement agreement in the next two weeks, the Court directs the parties to schedule a mediation session by Monday, July 1, 2019.

SO ORDERED,

6/13/19

PAUL A. ENGELMAYER

United States District Judge